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8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,) CR. NO. 05-0129 OWW
12)
Plaintiff,) Government's Request for
13) Protective Order
v.)
14)
DOUGLAS J. TULLIS,)
15)
Defendants.) The Honorable Oliver W. Wanger
16)
17)
18)
_____)

19
20 INTRODUCTION

21 The Government is in the process of providing additional
22 discovery in the above-entitled action. Such additional discovery
23 consists of numerous image files that have been recovered during
24 the investigative stage of this case. In order to expedite the
25 discovery process, the government has agreed to reproduce such
26 files in a digital form. It is anticipated that the copy process
27 will take 14 to 21 days to complete.
28

1 Many of those image files that will be produced in discovery
2 depict identifiable juveniles engaged in sexually explicit conduct.
3 In order to protect those juveniles, the government requests that
4 this court issue a proposed protective order (attached hereto)
5 which will prevent the discovery material from being made public.

6
7 DATE: June 24, 2005

Respectfully
submitted,

10 MCGREGOR W. SCOTT
11 United States Attorney

12 By, /s/ Jonathan B. Conklin
13 JONATHAN B. CONKLIN
14 Assistant U.S. Attorney

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11 UNITED STATES OF AMERICA,) CR. NO. 05-0129 OWW
)
12 Plaintiff,) Protective Order
)
13 v.)
)
14 DOUGLASS J. TULLIS.)
)
15 Defendants.) The Honorable Oliver W. Wanger
)
16)
17)
18)
_____)

19
20 ORDER

21 _____ IT IS HERE BY ORDERED AS FOLLOWS:

22 Any digital discovery provided by the government pursuant to
23 its discovery obligation, shall not be reproduced by any party.
24 This includes reproducing such discovery in digital form.

25 No party shall transfer any of the digital discovery to any
26 source including other computers or digital storage devices.

27 The digital discovery shall not be transmitted in any manner,
28 including via the United States Mail or the Internet.

1 All parties shall take all steps necessary to prevent the
2 public dissemination of the digital discovery provided in this
3 case.

4 No party shall allow the digital discovery provided in this
5 case to be viewed by anyone except counsel for the parties, their
6 investigators and designated expert witnesses.

7 No defendant shall be allowed to view such digital discovery
8 unless in the company of defense counsel and then only for the
9 purpose of preparing for trial in the above-entitled action.

10 Each defense counsel shall return all digital discovery to the
11 government at the conclusion of their individual case.

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13 DATE: June27, 2005

14 /s/ OLIVER W. WANGER

15 _____
16 OLIVER W. WANGER
17 United States District
18 Court Judge
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